

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: WARNER MUSIC GROUP  
DATA BREACH

Case No.: 1:20-cv-07473-PGG

**NOTICE OF DEFENDANT WARNER MUSIC GROUP CORP.'S MOTION TO  
DISMISS THE FIRST AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law in support of this motion, Defendant Warner Music Group Corp., by and through its undersigned counsel, will move this Court before the Honorable Paul G. Gardephe, at a place and time to be determined by the Court, for an order dismissing the First Amended Consolidated Class Action Complaint pursuant to Federal Rule of Civil Procedure 12(b)(1) for lack of subject matter jurisdiction based on Plaintiffs' failure to allege Article III standing, and Rule 12(b)(6) for failure to state a claim upon which relief can be granted.

Dated: October 1, 2021

Respectfully submitted,

/s/ Jessica Kaufman

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*Attorneys for Defendant*  
*WARNER MUSIC GROUP CORP.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of October, 2021, I served the (1) Notice of Defendant Warner Music Group Corp.'s Motion to Dismiss the First Amended Consolidated Class Action Complaint; (2) Memorandum of Law in Support of Defendant Warner Music Group Corp.'s Motion to Dismiss the First Amended Consolidated Class Action Complaint; and (3) [Proposed] Order Granting Warner Music Group Corp.'s Motion to Dismiss the First Amended Consolidated Class Action Complaint via email to counsel of record.

/s/ Jessica Kaufman

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